

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Dimario Eugene WILLIAMS

Case: 2:21-mj-30026

Assigned To : Unassigned

Assign. Date : 1/14/2021

CMP: SEALED MATTER (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 2020 through September 2020 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. 922(a)(6)

Providing a False Statement During the Purchase of a Firearm

18 U.S.C. 922(a)(1)(A)

Engaging in the Business of Dealing Firearms Without a License

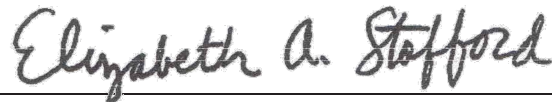
This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: January 14, 2021

City and state: Detroit, Michigan

*Complainant's signature*Special Agent Shannon Richardson - ATF*Printed name and title**Judge's signature*Honorable Elizabeth Stafford U.S. Magistrate Judge*Printed name and title*

AFFIDAVIT

I, Special Agent Shannon B. Richardson, being duly sworn, state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) since November of 2015. I am currently assigned to the Detroit, Michigan, Field Division, Group 1. I am tasked with investigating violations of Federal firearms and narcotic laws, and have been involved in numerous such investigations. Prior to my employment with ATF, I was employed by the Detroit Police Department for approximately 14 years as a police officer. During that time, I investigated violations of State of Michigan firearms and narcotic laws. In addition, I have completed the Criminal Investigator Training Program, Special Agent Basic Training at the Federal Law Enforcement Training Center, and the Detroit Metropolitan Police Academy. I have participated in numerous investigations involving violations of federal firearms and narcotics laws, resulting in the arrest and conviction of numerous criminal defendants and the seizure of large quantities of firearms. During my employment with ATF, I have participated in various aspects of criminal investigations and used a variety of investigative methods, including interviews, physical and electronic surveillance, confidential informants, and search warrants.

2. I make this affidavit from personal knowledge based on my participation in this investigation, including witness interviews by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all information known to law enforcement related to this investigation.

3. Probable cause exists that Dimario Eugene WILLIAMS (DOB: xx/xx/1998) engaged in the business of dealing firearms without a license, in violation of 18 U.S.C. 922(a)(1)(A) and provided a false statement during the purchase of a firearm, in violation of 18 U.S.C. § 922(a)(6).

INVESTIGATION AND PROBABLE CAUSE

4. In June 2020, I reviewed an ATF Firearms Trace Summary Report relating to Dimario WILLIAMS. The ATF Firearms Trace Summary Report is a report that is generated to document the purchaser of the firearm, and the individual who was found to be in possession of the purchased firearm. This trace summary indicated that on May 23, 2020, Detroit Police Department (DPD) recovered a Ruger model SR40, .40 caliber pistol, serial number 334-09402, from a person who was not Dimario WILLIAMS, only eight days after Dimario WILLIAMS purchased it on May 15, 2020 from CC Coins LLC, a Federal

Firearms Licensee in Dearborn Heights, Michigan. Phone records document communication on March 21, 2020 (approximately two months prior to WILLIAMS purchasing the Ruger model SR40 from CC Coins LLC) between WILLIAMS's cell phone and phone of the person from whom DPD recovered the Ruger model SR40.

5. On August 7, 2020, I spoke to an employee at CC Coins LLC, d/b/a CC Coins Jewelry and Loans, a Federal Firearms Licensee, who indicated he/she was contacted by the ATF Tracing Center regarding another firearm purchased by Dimario Eugene WILLIAMS. In addition, the employee indicated WILLIAMS purchased multiple firearms during the past few months from CC Coins LLC.

6. On August 7, 2020 I reviewed another ATF Firearms Trace Summary involving Dimario WILLIAMS. This trace summary revealed that on July 24, 2020, Detroit Police Department recovered a Taurus G2C, 9mm pistol, serial number ABE591717, from a person who was not Dimario WILLIAMS, twenty-three days after WILLIAMS purchased it on July 1, 2020, from CC Coins LLC, a Federal Firearms Licensee in Dearborn Heights, Michigan.

7. In August 2020, I reviewed ATF Forms 4473 relating to firearms purchased by WILLIAMS from March 2020 through July 2020, from CC Coins LLC. An ATF Form 4473 documents an individual's purchase of firearms from a

Federal Firearms Licensee. WILLIAMS purchased sixteen firearms from CC Coins.

8. On September 14, 2020, ATF Agents conducted surveillance at CC Coins and observed WILLIAMS and two other individuals exit CC Coins and get into a silver Chrysler Town & Country bearing Michigan License plate EAS0137. Agents followed WILLIAMS directly from CC Coins LLC to xxxx3 Plymouth, Detroit, Michigan. Agents observed WILLIAMS and the other two individuals enter the apartment building through the front east entrance door on Plymouth Rd., Detroit, Michigan.

9. On September 14, 2020, Detroit Police Officers made contact with the resident located at xxxx3 Plymouth Rd., apartment # xx, Detroit, Michigan. Dimario WILLIAMS answered the door, provided his name to the officers, and stated that he lived at the residence.

10. On September 14, 2020, agents returned to CC Coins LLC and spoke to an employee who stated that on this date WILLIAMS purchased one Taurus, Spectrum, .380 caliber pistol, serial number 1F009616.

11. On September 14, 2020, I reviewed video surveillance footage at CC Coins LLC from August 31, 2020, September 12, 2020, and September 14, 2020, which all showed WILLIAMS inside CC Coins LLC with at least two other individuals. Video surveillance footage from September 14, 2020 shows

WILLIAMS and Other Individual #1 standing near the register, which was on top of “U” shaped firearms display cabinets, while Other Individual #2 was about eight to ten feet away from WILLIAMS looking inside the firearms display cabinets. WILLIAMS placed his ID on top of the display cabinets and then walked over to Other Individual #2. Other Individual #2 pointed to a firearm in the display cabinet, while holding a cell phone in the same hand. WILLIAMS looked down at the firearms in the display cabinet then walked back toward the register and picked up his ID.

12. On September 30, 2020, I obtained a federal search warrant for xxxx3 Plymouth Rd., apartment xx, Detroit, Eastern District of Michigan, WILLIAMS’s current residence.

13. On October 6, 2020, state and federal law enforcement executed the federal search warrant. A search of the residence revealed one CMMG Inc., Banshee, 9mm handgun, serial number AMS02496 (along with the gun box); one FN, 509, 9mm handgun, serial number GKS0111531 (along with the gun box); one gun box for a Taurus, G2c handgun, serial number ABH817110; one gun box for a Kel-Tec, Sub-2000, 9mm rifle, serial number FFNX75; one gun box for a Glock 29GEN4 handgun, serial number BNNU371; one Apple box containing Pistol Sales Records; one clear plastic baggie containing approximately 6.6 grams of

suspected marijuana; miscellaneous documents; and one iPhone contained inside of a red case.

14. During the search of the premises, WILLIAMS was advised of his Miranda Rights and agreed to answer questions. WILLIAMS indicated to agents that he purchased firearms from Uncoil Firearms, IFA Tactical, Top Gun, and CC Coins LLC. WILLIAMS indicated that he purchased multiple firearms for other people. The unidentified people gave WILLIAMS the money for the cost of the firearm and an additional \$500.00 for each firearm that he purchased. WILLIAMS stated that his firm price for purchasing firearms for other people was \$500.00. I showed WILLIAMS a screen shot from the video surveillance footage on September 14, 2020, and WILLIAMS stated that one of the other individuals pointed out the firearm he/she wanted, and WILLIAMS purchased the firearm for that individual. WILLIAMS said that he only has two firearms. WILLIAMS also indicated that he has marijuana in his apartment, that he smokes marijuana three times a day, and that he has been smoking marijuana since he was seventeen years old.

15. Operations Investigator (IOI) Charles Rice queried the Federal Licensing System which revealed that WILLIAMS does not have and never has held a Federal Firearms License permitting him to repetitively buy and sell firearms.

16. WILLIAMS has a Michigan identification card listing his address as xxxx5 Rutherford, Detroit, Michigan, which was obtained on October 6, 2016. When WILLIAMS completed the ATF Forms 4473, he listed xxxx5 Rutherford as his home address on all of the forms. I queried WILLIAMS in Accurint which revealed WILLIAMS' address is listed as xxxx5 Rutherford, Detroit, Michigan since February 2017.

17. In order to purchase a firearm, the purchaser must fill out a federal form entitled "Firearms Transaction Record," or ATF Form 4473. On every Form 4473, question 11.a. asks whether the individual filling out the form is the "actual transferee/buyer," and warns: "You are not the actual transferee/buyer if you are acquiring the firearm(s) on behalf of another person." Under federal law, with a few exceptions (i.e. gifts), the purchaser is not allowed to purchase a firearm for someone else. This is called a "straw purchase," and violates 18 U.S.C. § 922(a)(6), which prohibits making a false statement during the purchase of a firearm.

18. Another section of each ATF Form located directly above the purchaser signature line informs the purchaser of specific federal violations that pertain to firearm purchases. This section also asks about truthfulness on the earlier questions on the form. It states, "I further understand that the repetitive purchase of firearms for the purpose of resale for livelihood and profit without a

Federal firearms license is a violation of Federal law (see instructions for Question 14).” The instructions for Question 14 state the federal statute 18 U.S.C. § 922 (a)(1)(A), which makes it unlawful for a person to deal in firearms without a license.

19. I have acquired all of the ATF Forms 4473 completed and signed by WILLIAMS from CC Coins LLC, IFA Tactical, Top Gun and Uncoil Firearms between March 6, 2020 and September 14, 2020 for each firearm that he purchased. WILLIAMS purchased twenty-five (25) firearms in total from these locations during this period of approximately six months. On each ATF Form 4473, WILLIAMS indicated that he was the “actual transferee/buyer” of each firearm.

CONCLUSION

20. Probable cause exists that Dimario WILLIAMS engaged in the business of dealing firearms without a license, in violation of 18 U.S.C. 922(a)(1)(A) and

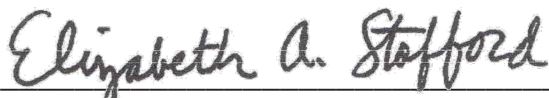
provided a false statement during the purchase of a firearm, in violation of 18 U.S.C.
§ 922(a)(6).

Respectfully Submitted,



Shannon B. Richardson
Special Agent, ATF

Sworn to before me and signed in my
presence and/or by reliable electronic means.



ELIZABETH STAFFORD
UNITED STATES MAGISTRATE JUDGE

Date: January 14, 2021